



IDAHO DEPARTMENT
OF HEALTH AND WELFARE

DIVISION OF
ENVIRONMENTAL QUALITY

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Philip E. Batt, Governor

November 8, 1995

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Program Management

Ms. Lisa Green, Director
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, ID 83401-1563

RE: Review Comments on OU 5-05 and 6-01 Draft Final Record of Decision

Dear Ms. Green:

The Idaho Department of Health and Welfare, Division of Environmental Quality (IDHW/DEQ) has reviewed the OU 5-05 and 6-01 Draft Final Record of Decision (ROD), received November 3, 1995. In general, the Draft Final ROD is comprehensive, well-written and reflects the agreements made by the Agencies in recent discussions.

However, we have identified an outstanding concern related to the issue of groundwater monitoring associated with Alternative 1 (No Action). Since a determination has been made that there is no unacceptable risk to groundwater from either burial ground, any discussion of groundwater monitoring, as well as associated costs, should be eliminated from the ROD completely. We consider this issue significant and request revision of the ROD accordingly for resubmittal to the Agencies. We have also identified several relatively minor editorial points that should be addressed at the same time as the groundwater monitoring issue to add clarity to the ROD. The following are our specific comments:

1) Pages 42 and 43, Section 7.2.1

Alternative 1 is described as to include environmental monitoring of air, groundwater and soil media. Since a determination has been made that there is no risk to groundwater from either burial ground, any discussion of groundwater monitoring, as well as associated costs, should be eliminated from this section to be made consistent with the documentation of significant change in Section 11.2.

2) Page 44, Section 7.2.2, Paragraph 4

The reference to "WAG 10-04 Comprehensive RI/FS" should be revised to indicate "WAG 10-06 Comprehensive RI/FS".

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3) Page 50, Section 8.2.5, Paragraph 2

This paragraph should be revised to reflect that the cost estimates presented in the ROD for Alternative 1 (both SL-1 and BORAX-I) are different from the costs presented in the Proposed Plan. (Refer to Comment No. 1 above regarding the need to eliminate groundwater monitoring costs.)

4) Page 51, Tables 9 and 10

The "construction and construction operations" cost element for Alternative 1 should be revised to eliminate associated groundwater monitoring costs; footnote c. should be revised accordingly. Also, footnote a. should be revised as follows: **"Alternative 3 costs are for 1994; Alternatives 1 and 2 costs are for 1995."** (Refer to Comment No. 1 above regarding the need to eliminate groundwater monitoring costs.)

5) Page 53, Section 9.1, Last Paragraph

Two minor typographical errors were noted: "BORAX-I" in the first sentence and "burial grounds" in the third sentence.

6) Page 63, Section 11.1, Paragraph 1

The last sentence should be revised to specify "...consolidation of the entire 84,000-square foot...area at **BORAX-I.**"

7) Page 65, Section 11.3

The refined cost estimates for SL-1 should be revised to indicate **"\$1,907,000"** to reflect the most recent cost refinements.

In addition, there are two separate issues that still need to be addressed before finalization/execution of the ROD. The first issue is related to the engineering design file titled "ARA Windblown Area Risk Evaluation" and associated letter report titled "Assessment of Surface Soils Surrounding the SL-1 Burial Ground". These reports were identified in the Draft Final ROD (Section 11.1 and Appendix B--Administrative Record File Index) as the documentation necessary to support the surface soil consolidation decision for SL-1 and redefinition of the OU 5-05 outermost boundary. As was agreed by the Agencies during an October 26, 1995 conference call, DOE was to prepare a memorandum for the Administrative Record which documents the problems (limited use and lack of accuracy) associated with the engineering design file. It was also agreed that the engineering design file would not be revised; however, the associated letter

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report was to be revised in response to IDHW/DEQ comment. Furthermore, DOE was to respond in writing to IDHW/DEQ's October 13, 1995 letter which conveyed outstanding concerns related to these two reports. It is imperative that these concerns be addressed and resolution incorporated into the Administrative Record before finalization/execution of the ROD.

The second issue pertains to the preliminary remediation goal listed in the ROD for strontium-90. IDHW/DEQ commented previously that this PRG may be in error; DOE's response to this comment was not adequate. Consequently, DOE has agreed to reassess the accuracy of the PRG for strontium-90. IDHW/DEQ is still awaiting an adequate response to this comment.

Should you have any questions regarding these comments, please contact me at your earliest convenience. My telephone number is (208) 373-0528.

Sincerely,



E. Jean Underwood
WAG 5 Manager
Remediation Bureau

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cc:

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